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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$48,500.00 IN
15 U.S. CURRENCY,
16 Defendant.

2:21-MC-00012-MCE-DB

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

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18 It is hereby stipulated by and between the United States of America and potential claimants
19 Xiaobing Wang, Min Guo, and Lianfeng Li, (“claimants”), by and through their respective counsel as
20 follows:

21 1. On or about October 22, 2020, claimants filed claims in the administrative forfeiture
22 proceeding with the Department of Homeland Security, U.S. Customs and Border Protection (“CBP”)
23 with respect to the Approximately \$48,500.00 in U.S. Currency (hereafter “defendant currency”), which
24 was seized on or about August 26, 2020.

25 2. The CBP has sent the written notice of intent to forfeit required by 18 U.S.C. §
26 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
27 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has filed a
28 claim to the defendant currency as required by law in the administrative forfeiture proceeding.

1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
4 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
5 parties. That deadline was January 20, 2021.

6 4. By Stipulation and Order filed January 22, 2021, the parties stipulated to extend to April
7 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture against
8 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
9 forfeiture.

10 5. By Stipulation and Order filed April 28, 2021, the parties stipulated to extend to June 18,
11 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
12 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
13 forfeiture.

14 6. By Stipulation and Order filed June 21, 2021, the parties stipulated to extend to August
15 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture against
16 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
17 forfeiture.

18 7. By Stipulation and Order filed August 17, 2021, the parties stipulated to extend to
19 October 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
21 subject to forfeiture.

22 8. By Stipulation and Order filed October 22, 2021, the parties stipulated to extend to
23 December 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
25 subject to forfeiture.

26 9. By Stipulation and Order filed December 22, 2021, the parties stipulated to extend to
27 February 15, 2022, the time in which the United States is required to file a civil complaint for forfeiture
28 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is

1 subject to forfeiture.

2 10. By Stipulation and Order filed February 16, 2022, the parties stipulated to extend to May
3 16, 2022, the time in which the United States is required to file a civil complaint for forfeiture against
4 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
5 forfeiture.

6 11. By Stipulation and Order filed May 25, 2022, the parties stipulated to extend to August
7 15, 2022, the time in which the United States is required to file a civil complaint for forfeiture against
8 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
9 forfeiture.

10 12. By Stipulation and Order filed August 22, 2022, the parties stipulated to extend to
11 November 14, 2022, the time in which the United States is required to file a civil complaint for
12 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
13 currency is subject to forfeiture.

14 13. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
15 to January 13, 2023, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
17 subject to forfeiture.

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1 14. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
3 alleging that the defendant currency is subject to forfeiture shall be extended to January 13, 2023.
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5 Dated: 11/9/2022

PHILLIP A. TALBERT
United States Attorney

7 By: /s/ Kevin C. Khasigian
8 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

10 Dated: 11/8/2022

11 /s/ Mark J. Reichel
12 MARK J. REICHEL
Attorney for potential claimants
Xiaobing Wang, Min Guo, and Lianfeng Li
(Signature authorized by email)

14 IT IS SO ORDERED.

15 Dated: November 16, 2022

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17 MORRISON C. ENGLAND, JR.
18 SENIOR UNITED STATES DISTRICT JUDGE
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